

March 18, 2015

Honorable A. Kathleen Tomlinson
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re: Randy A. Hoskins a/k/a Randy White v. County
of Nassau, et al.
Civil Action No.: CV-14-4722 (SJF) (AKT)
LJAA File No.: 0153.1321.0000**

Dear Judge Tomlinson:

This firm represents the County of Nassau, the Nassau County Police Department, and the Nassau County Sheriff's Department in the above-referenced litigation. This letter is sent in response to Your Honor's Order of today's date. As an initial matter, I apologize for misunderstanding Your Honor's ruling at the March 5 conference, and for any inconvenience that misunderstanding may have caused.

The Nassau County Police Department Internal Affairs Unit has completed its investigation, and its report, concerning the events at issue in this litigation.

My office now has in its possession a copy of the complete Internal Affairs Unit file, including the above referenced report. Pursuant to Your Honor's directive at the March 5, 2015 conference, the Internal Affairs Unit file will be produced to the parties in this litigation, as soon as each of the parties has executed a Confidentiality Agreement.

On the afternoon of March 5, 2015, a draft confidentiality agreement was emailed to Counsel for all parties, along with a request for their comments and/or execution. As of the date of this letter, my office has not received any response from Counsel. Under separate cover, a copy of the draft confidentiality agreement is being redistributed to all Counsel today, along with a request for comments and/or execution by the parties.

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Thank you for your consideration.

Very truly yours,



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